



ALEXANDER W. KNOWLES
Senior Staff Attorney

Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

June 1, 2022

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Procedural Schedule for the Integrated Resource Plans (IRP's) Filed with the
Public Service Commission - **Docket No. 2022-162-E**;

Public Service Commission of South Carolina - Administrative and Procedural
Matters - **Docket No. 2005-83-A**;

Dominion Energy South Carolina, Incorporated's 2023 Avoided Cost Proceeding
Pursuant to S.C. Code Ann. Section 58-41-20(A) - **Docket No. 2023-15-E**;

Duke Energy Carolinas, LLC's 2023 Avoided Cost Proceeding Pursuant to S.C.
Code Ann. Section 58-41-20(A) - **Docket No. 2023-16-E**; and

Duke Energy Progress, LLC's 2023 Avoided Cost Proceeding Pursuant to S.C.
Code Ann. Section 58-41-20(A) - **Docket No. 2023-17-E**

Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff ("ORS") has reviewed the Procedural Schedules for the Integrated Resource Plans ("IRPs") filed with the Public Service Commission of South Carolina ("Commission") and the 2023 Avoided Cost Proceedings for Dominion Energy South Carolina, Inc. ("DESC"), Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") (collectively and together with the South Carolina Public Service Authority, the "Entities") proposed by the Commission Staff ("Procedural Schedules").

Overall, ORS does not object to the Procedural Schedules proposed by the Commission and would take this opportunity to thank the Commission and Commission Staff for developing the Procedural Schedules for review and comment by interested parties. ORS does have one recommended change with respect to the proposed scheduling of the hearing for DESC's 2023 IRP. ORS respectfully submits that its recommended change would further enhance the ability of ORS and intervenors to review the reasonableness and prudence of the upcoming IRPs.

The Honorable Jocelyn G. Boyd
June 1, 2022
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ORS recommends the Commission schedule DESC's 2023 IRP Hearing in late August 2023, so the amount of time for review between DESC's filing and hearing more closely aligns with the amount of time for review of DEC's, DEP's and the South Carolina Public Service Authority's IRPs prior to those hearings. According to South Carolina Code Ann. § 58-37-10(C)(1), "[t]he commission shall establish a procedural schedule to permit reasonable discovery after an integrated resource plan is filed in order to assist parties in obtaining evidence concerning the integrated resource plan, including the reasonableness and prudence of the plan and alternatives to the plan raised by intervening parties." In general, the Procedural Schedules proposed by the Commission allow and promote meaningful intervenor participation and ensure the parties have the opportunity to issue reasonable discovery and obtain evidence concerning each of the Entities' IRPs. Importantly, the Proposed Schedules avoid a situation where the Entities file their IRPs in a way that the times for review of individual IRPs unduly overlap, which would negatively impact the right and ability of ORS and intervenors to conduct necessary discovery and obtain and review evidence concerning the reasonableness and prudence of an IRP. The Procedural Schedules allow the Commission and intervening parties sufficient time to thoroughly review each of the Entities' IRPs to support the Commission in making its determination of whether the Entities' IRPs represent the most reasonable and prudent means of meeting the electrical utility's energy and capacity needs as of the time the plan is reviewed.¹

ORS respectfully submits that scheduling DESC's 2023 IRP Hearing in late August 2023 would further enhance the ability of ORS and intervenors to thoroughly review the IRPs and would promote consistency in the amount of time allocated for review of each of the Entities' IRPs. ORS does not object to the remaining dates as proposed by the Commission Staff in the Procedural Schedules.

ORS will participate in the forum scheduled for Wednesday, June 15, 2022, and looks forward to continued collaboration with the Commission Staff and other parties on the proposed Procedural Schedules. Thank you for the opportunity to provide these comments.

Sincerely,

s/ Alexander W. Knowles

Alexander W. Knowles

cc: All Parties of Record
C. Jo Anne Wessinger-Hill, Esquire
David Butler, Esquire
(all via electronic mail)

¹ See S.C. Code Ann. § 58-37-10(C)(2).